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ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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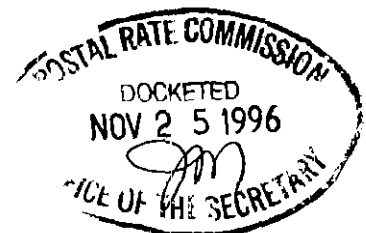
SPECIAL SERVICES REFORM, 1996

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. MC96-3

UNITED STATES POSTAL SERVICE MOTION FOR
LATE ACCEPTANCE OF THE RESPONSE
TO OCA/USPS-89
(November 22, 1996)

The Office of the Consumer Advocate (OCA) filed interrogatory OCA/USPS-89 on November 6, 1996. The response to that interrogatory, filed herewith, was due on November 20, the most recent day of hearings in this case.

Late on the day this response was due, the Postal Service discovered a problem in its answers that needed resolution prior to filing. The next day, further problems were discovered. Counsel for the Postal Service accordingly contacted Mr. Costich of the OCA to discuss the matter. Mr. Costich indicated that he wanted the opportunity to review the answers before filing a designation of written cross-examination on Friday, November 22, and accordingly requested that the Postal Service not wait until the end of the day to file the response. A copy of what is expected to be filed later this afternoon has been faxed to Mr. Costich. No party is expected to be prejudiced by this late filing.



- 2 -


WHEREFORE, the Postal Service respectfully requests a two-day extension of time to file the answer to OCA/USPS-89.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

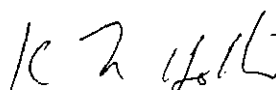
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Kenneth N. Hollies

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Kenneth N. Hollies

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November 22, 1996